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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

| | | |
|--|---|----------------------------|
| Jake Stanley De Wilde, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 1:23-cv-00003-SWS |
| |) | |
| Attorney General of the United States; |) | |
| Director of the Bureau of Alcohol, |) | |
| Tobacco, Firearms, and Explosives, |) | |
| |) | |
| Defendants. |) | |
| |) | |
| |) | |

DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT

Defendants Merrick Garland, in his official capacity as the Attorney General of the United States of America, and Steven Dettelbach, in his official capacity as Director of the Bureau of

Alcohol, Tobacco, Firearms, and Explosives, through undersigned counsel, hereby move to dismiss the Amended Complaint for Declaratory and Injunctive Relief (Doc. 15), for failure to state a claim, pursuant to Federal Rule of Civil Procedure 12(b)(6). The accompanying Memorandum in Support of Defendants' Motion to Dismiss the Amended Complaint further states the grounds for this Motion.

Dated this 3rd day of April, 2023.

Respectfully Submitted,

NICHOLAS VASSALLO
United States Attorney

By: /s/ Jeremy A. Gross
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